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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

14 IN RE GRITSTONE BIO, INC. SECURITIES
LITIGATION

16 THIS DOCUMENT RELATES TO: ALL
ACTIONS

Case No.: 3:24-cv-03640-CRB

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER AMENDING BRIEFING
SCHEDULE FOR MOTION TO DISMISS
THE SECOND AMENDED
COMPLAINT AND CONTINUING
MOTION HEARING**

Hon. Charles R. Breyer

Pursuant to Civil Local Rules 6-2, Lead Plaintiff Richard Rodriguez and Additional Plaintiff Tammy Beal (“Plaintiffs”) and Defendant Andrew R. Allen (“Defendant”) respectfully request that the Court enter the parties’ stipulation below to amend the briefing schedule for Defendant’s motion to dismiss the Second Amended Complaint (Dkt. 70, “SAC”).

WHEREAS, On July 24, 2025, the Court granted Defendant’s motion to dismiss the First Amended Complaint (“FAC”) (“Order”), dismissing without prejudice the claims against Defendant and directing Plaintiffs to file any amended complaint no later than 28 days from the issuance of the Order;

WHEREAS, on August 21, 2025, Plaintiffs filed the SAC against Defendant;

WHEREAS, Defendant’s counsel informed Plaintiffs’ counsel that Defendant intends to move to dismiss the SAC;

WHEREAS, on August 26, 2025, the Court granted the parties’ Stipulation and [Proposed] Order Regarding Briefing Schedule and Page Limits for Motion to Dismiss the SAC (Dkt. 72, “First Stipulation and Order”), entering the following briefing schedule and page limits:

- **Defendant’s motion to dismiss the SAC:** October 10, 2025, no more than 25 pages
- **Plaintiffs’ opposition to Defendant’s motion to dismiss:** November 24, 2025, no more than 25 pages
- **Defendant’s reply in support of the motion to dismiss:** December 19, 2025, no more than 15 pages
- **Motion hearing:** January 16, 2026 at 10:00 a.m. by videoconference;

WHEREAS, on October 6, 2025, Defendant’s counsel conferred with Plaintiffs’ counsel to request amending the briefing schedule and continuing the January 16, 2026 motion hearing in order to accommodate the unforeseen travel and scheduling conflicts of Defendant’s counsel, and Plaintiffs’ counsel agreed;

WHEREAS, the parties agree that the page limits set forth in the First Stipulation and Order should continue to apply to any motion to dismiss the SAC and the associated response and reply thereto; and

WHEREAS, the parties previously stipulated to extend the deadline for Defendant to respond to the FAC and the SAC, and the parties' requested time modification below will not otherwise affect the schedule for the case.

IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court's approval, as follows:

1. On or before October 17, 2025, Defendant shall file his motion to dismiss the SAC.
2. On or before December 8, 2025, Plaintiffs shall file their brief in opposition to the motion to dismiss the SAC.
3. On or before January 2, 2026, Defendant shall file his reply brief in support of the motion to dismiss the SAC.
4. The parties respectfully request that the motion hearing, currently scheduled for January 16, 2026 at 10:00 a.m. by videoconference, be continued to a later date as the Court determines to be appropriate.

Dated: October 6, 2025

POMERANTZ LLP

By: /s/ Jennifer Pafiti

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1 Dated: October 6, 2025

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ATTORNEYS AT LAW

ATTESTATION OF CONCURRENCE IN FILING

I hereby attest that concurrence in the filing of this document has been obtained from counsel for Lead Plaintiff Richard Rodriguez and Additional Plaintiff Tammy Beal.

By: /s/ Catherine D. Kevane
Catherine D. Kevane

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE

FENWICK & WEST LLP
ATTORNEYS AT LAW